

STATEMENT OF BASIS (AI No. 109450)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0124796 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Baker Machine Company, Inc.
4019 Shreveport Blanchard Highway
Shreveport, LA 71107

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Ronda Burtch

DATE PREPARED: October 23, 2009

1. PERMIT STATUS

A. Reason for Permit Action:

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit – NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LPDES permits – LPDES permit LAR05N372
LPDES permit effective date: May 24, 2006
LPDES permit expiration date: April 30, 2011

Upon the effective date, the FINAL PERMIT shall replace the previously effective LPDES permit, LAR05N372.

D. Date Application Received: April 24, 2009

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - oilfield tool and equipment machine shop

Baker Machine Company is an oilfield tool and equipment machine shop. The facility machines, repairs, and reworks oilfield drilling tools and equipment.

Statement of Basis for
Baker Machine Company, Inc.,
LA0124796, AI No. 109450
Page 2

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II (The points for this facility have been BPJ'd to 0 based on the low volume of wastewater discharged and other similar light commercial facilities.)
3. Wastewater Type: II
4. SIC code: 3533 and 1389

C. LOCATION - 4019 Shreveport Blanchard Highway in Shreveport, Caddo Parish
Latitude 32° 31' 24", Longitude 93° 49' 07"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: equipment washwater

Location: at the point of discharge from the oil/water separator, prior to mixing with other waters

Flow: intermittent

Discharge Route: local drainage, thence into Twelve Mile Bayou, thence into the Red River

Per the application, this facility utilizes an individual treatment system for their sanitary wastewater that discharges to a septic tank to underground absorption lines.

4. RECEIVING WATERS

STREAM: local drainage, thence into Twelve Mile Bayou, thence into the Red River

BASIN AND SEGMENT: Red River Basin, Segment 100310

DESIGNATED USES:

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply
- f. agriculture

Per LAC 33:IX.1111, "Surface waters designated as drinking water supplies are specifically so designated in LAC 33:IX.1123, Table 3; this designation does not apply to their tributaries or distributaries unless so specified."

5. TMDL STATUS

Subsegment 100310, Cross Lake, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDLs have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

Statement of Basis for
Baker Machine Company, Inc.,
LA0124796, AI No. 109450
Page 3

6. CHANGES FROM PREVIOUS PERMIT

This is an initial permit.

7. COMPLIANCE HISTORY/COMMENTS

A. OEC

Inspections: There have been no inspections performed at this facility since September 15, 2005.

Enforcement Actions: There are no enforcement actions administered against this facility.

B. DMR Review: There are no DMRs on file for this facility. However, this facility was required to conduct benchmark monitoring in 2007 for LPDES permit LAR05N372.

8. EXISTING EFFLUENT LIMITS

Since this is an initial permit, there are no existing effluent limits.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 100310 of the Red River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rick (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

Statement of Basis for
Baker Machine Company, Inc.,
LA0124796, AI No. 109450
Page 4

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for
 Baker Machine Company, Inc.,
 LA0124796, AI No. 109450
 Page 5

Rationale for Baker Machine Company, Inc.

1. **Outfall 001** – equipment washwater (estimated flow is intermittent)

| Pollutant | Limitation | | Reference |
|----------------------|------------------|-------------|---------------------------------------------------|
| | Monthly Avg | Daily Max | |
| | mg/L | | |
| Flow | Report | Report | LAC33:IX.2707.I.1.b |
| COD | 200 | 300 | Similar discharges*, LAG480000, Schedule B, (BPJ) |
| TSS | --- | 45 | Similar discharges*, LAG480000, Schedule B, (BPJ) |
| Oil & Grease | --- | 15 | Similar discharges*, LAG480000, Schedule B, (BPJ) |
| Soaps & Detergents | Inventory Record | --- | Similar discharges*, LAG480000, Schedule B, (BPJ) |
| Oil & Grease, Visual | --- | No Presence | Similar discharges*, LAG480000, Schedule B, (BPJ) |
| pH, s.u. | 6.0 (min) | 9.0 (max) | Similar discharges*, LAG480000, Schedule B, (BPJ) |

Treatment: Oil/water separator

Monitoring Frequency:

Oil & Grease, Visual: Daily at the point of discharge from the oil/water separator, prior to mixing with other waters

TSS, COD, Oil & Grease, and pH: Quarterly at the point of discharge from the oil/water separator, prior to mixing with other waters.

Soaps and Detergents: Document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

Limits Justification:

Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities, BPJ, and the Light Commercial General Permit LAG480000, effective August 1, 2001.

This facility is not eligible for the Exterior Vehicle Wash Wastewater permit, LAG750000, because it does not apply to discharges which involve waste from oil field service facilities. Therefore, an individual permit is being issued to this facility instead of a general permit.

Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are being placed in the permit.

Statement of Basis for
Baker Machine Company, Inc.,
LA0124796, AI No. 109450
Page 6

| | |
|------|---------------------------------------|
| * | Existing permits for similar outfalls |
| BPJ | Best Professional Judgement |
| s.u. | Standard Units |

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 3533 are considered to have storm water discharges associated with industrial activity.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).